

OCI Foundation International

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Policy On Prevention Of Sexual Exploitation, Abuse and Harassment, PSEAH (March 2025)

This policy document of the OCI Foundation relates to the Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) of adults aged 18 years or more. It covers everyone directly or indirectly related to the OCI Foundation, including directors, members, volunteers, partners, and associates of any kind.

The OCI Foundation adopts a zero-tolerance approach to sexual exploitation and abuse and prohibits all forms of it. Everyone has an equal right to protection against this, irrespective of their age, racial background, gender, religious belief, sexual orientation, culture, and so on.

OCI Foundation's Approach to PSEAH

1. **Awareness:** We make efforts for every member and associate of the OCI Foundation to be aware of the high standards of behaviour and conduct expected of them in upholding the expectations against sexual abuse and exploitation in their private and professional engagements.
2. **Prevention:** All members and associates of the OCI Foundation are encouraged to take actions that will minimise the risks of sexual exploitation and abuse. Relevant vetting and background checks are among the measures that should be in place before any recruitment or engagement.
3. **Reporting:** Every member or associate of the OCI Foundation should be aware of the steps to take whenever there is a suspicion or concern relating to sexual exploitation or abuse.
4. **Responding:** The OCI Foundation encourages immediate action for identifying and addressing all reports of potential sexual exploitation and abuse while ensuring the safety and well-being of the persons involved.

Definition of Terms

1. **Sexual Abuse:** The threatened or actual physical intrusion of a sexual or sexualized nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include threatened or actual non-physical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs, etc.).

2. **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, trust, or dependency for sexual or sexualised purposes. This includes the offer or promise of monetary, social, or political benefits as an incentive or form of coercion.
3. **Sexual Favours:** Any sexual or sexualised acts in exchange for something such as money, goods, services, opportunities and so on. Also includes demands for inappropriate photographs, filming, and exposure to pornography and so on.
4. **Sexual Harassment:** Sexual harassment is any form of unwelcome sexual attention. It has nothing to do with mutual attraction or friendship between people, which is normal and positive. Sexual harassment involves humiliation or offence to the victim. It can be through:
 - a. Unwelcome physical touching, hugging, massaging or kissing, sexual or suggestive comments, jokes, taunts or name-calling.
 - b. Unwelcome requests for sex.
 - c. Insinuations about a person's private or sex life or sexual preference.
 - d. Offensive gestures or staring.
 - e. Sending SMS messages or emails without consent.
 - f. Unwelcome or uninvited remarks or insinuations about a person's appearance.
 - g. Posting of inappropriate comments, pictures, videos or blogs on websites.
 - h. The display or circulation of clearly sexual material (such as photos, pin-ups, screensavers, or pictures) or reading matter (such as emails, faxes, social media links, or letters).

Sexual harassment does not have to be repeated or ongoing to be against the law. Some actions or remarks are so offensive that they're clearly sexual harassment, even if not repeated. Other incidents, such as an unwanted invitation or compliment, are probably not considered harassment if they are isolated events. The harassment does not have to be deliberate. It can also occur in cases where a reasonable person would have expected the behaviour to be offensive. Some sexual harassment can also be a criminal offence.

Commitments to PSEAH

The OCI Foundation believes that everyone has a right to a life free of sexual violence and abuse of power, regardless of age, gender, sexual orientation, disability, religion, or ethnicity. We will not tolerate members or associates carrying out any form of sexual harassment, exploitation or abuse. The OCI Foundation commits to the assistance and support of survivors in improving safeguarding capacity, reporting, investigating, responding to, and preventing sexual harassment and sexual exploitation and abuse.

- Cases of sexual exploitation and abuse within the OCI Foundation are acts of gross misconduct and are grounds for disciplinary action, dismissal/termination or disengagement, as the case may be.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour by OCI Foundation members or associates, is always prohibited.
- Sexual relationships between OCI Foundation members and associates are

- forbidden under any circumstances.
- OCI Foundation members and associates are obliged to create and maintain an environment that prevents sexual exploitation and abuse.
- The OCI Foundation will make every effort to create and maintain a safe organisational culture for all those who work for, and with it.

Confidentiality of Complaint

The confidentiality of victims and reporters of sexual exploitation and abuse to the OCI Foundation will be protected to the highest possible level. All efforts will be made to maintain the integrity of the investigation and prevent further discrimination or harassment, or retaliation. Confidential or sensitive information obtained by any staff member during an investigation shall not be disclosed to others unless required by law. Concerns of individuals regarding confidentiality of information provided by them will be handled as sensitively as possible, and information shall not unnecessarily be disclosed to others.

Reporting and Complaints Mechanisms

Plus Education commits to:

- The appointment of a PSEAH focal person within the OCI Foundation. The focal person in this scenario is the CEO (see “Who to Report To” below).
- An effective reporting mechanism for complaints related to SEA arising from the field and within the OCI Foundation.
- A reporting mechanism that integrates with existing structures to create a unified system for handling feedback and complaints.
- Provide regular training for staff members to receive reports, speak to survivors, help act as survivor advocates, and effectively and efficiently process complaints.
- Establish protocols to facilitate the transparent processing of SEA complaints in a timely manner, including the immediate suspension of the alleged perpetrator from activities with direct impact on communities or staff until the investigation is concluded.
- Adhere to the principles of a survivor-centred approach by promoting confidentiality, transparency, respect, safety, and anonymity, and seek informed consent from all complainants (and the survivor where appropriate) of SEA.
- Ensure the protection of the victim, the complainant, and the whistleblower of SEA after verifying and confirming the reported facts through either an internal or external investigation.
- Take appropriate disciplinary action, including immediate termination of employment and referral for criminal prosecution and legal action, where appropriate, against the person who commits SEA, in accordance with the national law’s reporting and responding system.
- Ensures that there is no direct or indirect opportunity for harm to be caused to either the survivor or the complainant.
- Where the appropriate step is to report the complaint to local law enforcement authorities, it must be ensured that this is in compliance with the wishes of the survivor. If the survivor does not wish to pursue legal or criminal action, the OCI Foundation must honour their request and attempt to find alternative mechanisms to support or safeguard the survivor's interests.
- Entrench procedures that encourage people to report concerns without fear of reprisals or victimization at the organisational and community level, such as having multiple reporting channels where complaints can be raised and ensuring privacy and confidentiality.
- Ensure that multiple channels for OCI Foundation members, beneficiaries and

associates to safely report sexual exploitation and abuse and sexual harassment. These channels should be designed in consultation with local communities and staff to ensure that they are safe and accessible.

- Ensure that all individuals working for or with the OCI Foundation have access to information on how to report concerns through these safe channels. This should include posting reporting procedures in local languages and regularly explaining these channels.
- Provide training and information to all OCI Foundation members and associates to ensure they understand their obligations and how to discharge their duties in the event of a complaint.

Who to report to?

- Reports can also be sent to info@ocifoundation.org or via this online link: [HERE](#).
- Also see OCI Foundation's Policy on Complaints Handling [HERE](#).
- For our various countries of operation, these numbers can also be reached:
 - Australia: +61755808331
 - Nigeria: +2348066092959
 - United Kingdom: +447415676767

REVIEW OF POLICY

This policy is subject to review in March 2028, three years after its implementation. This can be sooner if legislation or other events warrant so.